REMARKS

Claims 16-21 and 24 are pending. The Examiner's reconsideration of the rejections is respectfully requested in view of the remarks.

Claims 16-20 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Troyansky et al. (US Application No. 2003/0190054) in view of Takashi et al. (US Application No. 2002/0059162) and further in view of Lemay et al. ("Laura Lemay's Web Workshop Creating Commercial Web Pages", Sams.net, 1996, pp.110-115) and further in view of Truong (U.S. Patent No. 6,151,609), and further in view of Levy et al. (US Application No. 2003/0012548). The Examiner stated essentially that the combined teachings of Troyansky, Takashi, Lemay, Truong, and Levy teach or suggest all the teachings of Claims 16-20.

Claim 16 claims, *inter alia*, "converting, automatically by the server, the content in text format to content in the image format according to the content creation preference; storing the content in the image format; and generating an HTML document containing a reference to the stored content in the image format for retrieval and inline dynamic assembly by the client."

Troyansky teaches a system and method for providing uniquely marked copies of data content via digital watermarks

(see Abstract and paragraph [0124]). Troyansky does not teach or suggest "generating an HTML document containing a reference to the stored content in the image format for retrieval and inline dynamic assembly by the client" as claimed in Claim 16 (emphasis added). Troyansky teaches a content processor that forms the sets of marked segments prior to distribution of the data content (see paragraph [0114]). Troyansky does not teach or suggest inline dynamic assembly by the client, as claimed in claim 16. The assembly of Troyansky is performed by a server. Therefore, Troyansky does not teach or suggest "generating an HTML document containing a reference to the stored content in the image format for retrieval and inline dynamic assembly by the client", essentially as claimed in Claim 16. Therefore, Troyansky fails to teach or suggest all the limitations of claim 16.

Takashi teaches a system and method for searching for a mark in an image; the mark is embedded by a server in a Web page created by the server such that the mark is difficult to perceive by a human (see Abstract and paragraph [0007]). Takashi does not teach or suggest "generating an HTML document containing a reference to the stored content in the image format for retrieval and inline dynamic assembly by the client" as claimed in Claim 16. Takashi teaches that information is transmitted to a client with a mark image

embedded therein; the server creates the Web page for the client (see paragraph [0022]). Takashi's method of creating marked information is performed by a server. A client of Takashi does not assemble a Web page. Thus, Takashi does not teach or suggest "generating an HTML document containing a reference to the stored content in the image format for retrieval and inline dynamic assembly by the client" as claimed in Claim 16. Takashi fails to cure the deficiencies of Troyansky.

Lemay teaches a web page including an image (see page 111). Lemay does not teach or suggest "generating an HTML document containing a reference to the stored content in the image format for retrieval and inline dynamic assembly by the client" as claimed in Claim 16. Lemay merely teaches a basic layout of a web page. Lemay does not teach inline dynamic assembly by the client, essentially as claimed in Claim 16. Therefore, Lemay fails to cure the deficiencies of Troyansky and Takashi.

Truong teaches an editor for remotely editing text files on a remote Internet server (see Abstract). Truong does not teach or suggest "generating an HTML document containing a reference to the stored content in the image format for retrieval and inline dynamic assembly by the client" as claimed in Claim 16. Truong teaches editing a text file stored on a server and served

as a complete assembled Web page (see element 106 of Figure 3B). Truong does not teach or suggest inline dynamic assembly by the client of an HTML document and stored content, essentially as claimed in Claim 16. Therefore, Truong fails to cure the deficiencies of Troyansky, Takashi and Lemay.

Levy teaches a method by which a server performs integration of a watermark in content (see paragraph [0093]). Levy does not teach or suggest "generating an HTML document containing a reference to the stored content in the image format for retrieval and inline dynamic assembly by the client" as claimed in Claim 16. In Levy's method a client is a creator of content and watermarked content, e.g., the Society of Motion Picture and Television Engineers or those desiring to tailor audio or video content presented to consumers (see paragraphs [0078] and [0033]). This type of client is very different from the client of Claim 16. For example, the client of Claim 16 is a requestor of content from the server. Levy's client is a provider of content to the server. More particularly, Levy teaches that content, a watermark and watermark parameters are sent to a server for integration and returned as a complete document for later broadcast to consumers. Clearly then, this is not analogous to retrieval and inline dynamic assembly by the client, as claimed in Claim 16.

In addition, it is clear from the teachings of Levy that the word "render" as used in paragraph [0094] refers to the playback of content by a server to a client. For example, see paragraphs [0021] and [0024], wherein rendering is specifically defined as "playback" (see paragraph [0021]), which is "rendering to the user" (see paragraph [0024]). Accordingly, the portions of paragraph [0094] that refer to placing an image in a web page at "render time" are preformed by the server and not the client, which is consistent with the rest of the disclosure of Levy.

Therefore, Levy fails to cure the deficiencies of Troyansky, Takashi, Lemay, and Truong.

Therefore, the combined teachings of Troyansky, Takashi, Lemay, Truong and Levy fail to teach or suggest, "generating an HTML document containing a reference to the stored content in the image format for retrieval and inline dynamic assembly by the client" as claimed in Claim 16.

Claims 17-20 depend from Claim 16. The dependent claims are believed to be allowable for at least the reasons given for Claim 16. The Examiner's reconsideration of the rejection is respectfully requested.

Claim 21 has been rejected under 35 U.S.C. 103(a) as being unpatentable over Troyansky, in view of Takashi, in view of Lemay, and further in view of Truong, and further in view of

Levy, and further in view of "Adobe PageMill 2.0 Handbook", Lewis, R., Hayden Books, 1996, pp. 138-143 (hereinafter PageMill). The Examiner stated essentially that the combined teachings of Troyansky, Takashi, Lemay, Truong, Levy, and PageMill teach or suggest all the teachings of Claim 21.

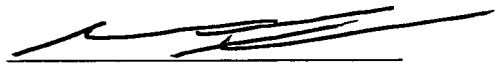
Claim 21 depends from Claim 16. Claim 21 is believed to be allowable for at least the reasons given for Claim 16. The Examiner's reconsideration of the rejection is respectfully requested.

Claim 24 has been rejected under 35 U.S.C. 103(a) as being unpatentable over Troyansky, in view of Takashi, in view of Lemay, and further in view of Truong, further in view of Levy, and further in view of Minematsu (U.S. Patent No. 6,700,993). The Examiner stated essentially that the combined teachings of Troyansky, Lemay, Truong, Levy, and Minematsu teach or suggest all the teachings of Claim 24.

Claim 24 depends from Claim 16. Claim 24 is believed to be allowable for at least the reasons given for Claim 16. The Examiner's reconsideration of the rejection is respectfully requested.

For the forgoing reasons, the application, including Claims 16-21 and 24, is believed to be in condition for allowance. Early and favorable reconsideration of the case is respectfully requested.

Respectfully submitted,

By: 

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